## EXHIBIT 12

## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

TWANA AHMED, :

Plaintiff, : Case No. 4:23-cv-02823

v. : Hon. Judge Lee H. Rosenthal

UNIVERSAL PROTECTION SERVICE, LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES,

:

Defendant.

.\_\_\_\_:

## **DECLARATION OF ALEXZANDER BERGERON**

I, Alexzander Bergeron, pursuant to 28 U.S.C. § 1746, state as follows:

- 1. I am a White male, over the age of 18, have knowledge of the matters set forth herein, and could testify competently to them if called as a witness.
- 2. I am presently employed by Universal Protection Service, LP d/b/a Allied Universal Security Services ("Allied Universal") as a Mobility Technician based in the Houston branch office. I previously worked as a Field Supervisor from November 5, 2021, through April 12, 2022, and was assigned to the H-E-B account. My direct supervisor at that time was Client Manager Patrick Freeney until he resigned in June 2022.
- 3. I have specific knowledge of Allied Universal's policies concerning the prevention of harassment, discrimination, and retaliation. I am familiar with the various reporting methods available to all employees including the employee hotline. I reported all known, perceived, or otherwise identified complaints of unfair or alleged unlawful conduct.
- 4. I am also knowledgeable and familiar with Allied Universal's personal appearance and grooming standards. Employees are permitted to wear facial hair, including beards that are

neat and trimmed. Allied Universal provides medical and religious accommodations to this policy.

I consistently wear facial hair, including a beard, without any accommodation, and at no point was

I asked to shave it.

- 5. As a Field Supervisor, I had regular opportunities to observe Twana Ahmed while he was employed, and he consistently wore a beard. I never requested that he shave his beard, nor did he complain to me that someone requested him to shave his beard.
- 6. On April 4, 2022, I learned that Mr. Ahmed used force to detain an alleged shoplifter at a H-E-B site location. I responded to the site location to review with the H-E-B store manager, and to discuss with Mr. Ahmed and the responding Bellaire police officers. While onsite at the H-E-B store, I reviewed video surveillance and observed Mr. Ahmed stop an alleged shoplifter before he left the store, push him against a wall, and place his wrists in handcuffs behind his back. At no point did Mr. Ahmed inform me of any alleged threat made by the subject or that he was allegedly armed with any type of weapon. I completed all notice and reporting requirements, including notifying Mr. Freeney.
- 7. While Mr. Ahmed was employed with Allied Universal, I was not made aware of, nor did he ever mention to me, his race, ancestry, ethnicity, national origin, or that he practiced any specific religion. I never knew, nor did he mention that he is of Kurdish descent.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and under the laws of the United States of America, that the foregoing is true and correct, except as to matters stated to be based on information and belief.

## FURTHER DECLARANT SAYETH NOT.

Executed on November \_\_\_\_\_, 2024.

Alexzander Bergeron Mobility Technician

Universal Protection Service, LP d/b/a Allied

Universal Security Services